

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

TANER MUNSIF and ELIZABETH M.	:	
RYAN, individually, and on behalf of	:	
other similarly situated individuals,	:	
<i>Plaintiffs</i>	:	
	:	
v.	:	C.A. NO.: 1:16-cv-00387-JJM-LDA
	:	
UTGR, INC., d/b/a LINCOLN PARK,	:	
alias,	:	
<i>Defendant</i>	:	
	:	

**JOINT MOTION FOR FINAL COLLECTIVE ACTION CLASS CERTIFICATION AND
FOR APPROVAL OF PROPOSED COLLECTIVE CLASS SETTLEMENT
AGREEMENT**

Now come the Lead Plaintiffs Taner Munsif and Elizabeth M. Ryan, individually and on behalf of Opt-in Plaintiffs in the above-captioned collective action,¹ and Defendant UTGR, Inc. (“Defendant”), and do hereby jointly move for a grant of final certification of the class of Plaintiffs that this Honorable Court conditionally certified and for approval of a proposed Settlement Agreement reached on behalf of the collective class in substantially the form attached hereto as Exhibit A. As grounds therefore and in support thereof, the Parties rely on their Joint Memorandum of Law filed simultaneously herewith.

WHEREFORE, the Parties respectfully pray that this Honorable Court enter and Order:

1. Granting final certification of the conditionally certified class; and,
2. Approving the Proposed Settlement Agreement.

¹ As used herein, the term “Plaintiffs” collectively refers to the Lead Plaintiffs and those Plaintiffs who have opted-into this lawsuit.

Plaintiffs,
By their attorneys,
SINAPI LAW ASSOCIATES, LTD.

/s/ Richard A. Sinapi
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Defendant UTGR, Inc.,
By its attorneys,
ADLER POLLOCK & SHEEHAN P.C.

/s/ Michael D. Chittick
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Dated: March 5, 2019

CERTIFICATION

Michael D. Chittick, Esq.
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I hereby certify that on **March 5, 2019**, a true copy of the within was filed electronically via the Court's CM/ECF System. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and the filing is available for viewing and downloading from the Court's CM/ECF System. Service on the counsel who has communicated that they will be represented Defendant listed above has been effectuated by electronic means.

I also certify that on **March 5, 2019**, a true copy of the within document was served electronically via email to all Plaintiffs in this action.

/s/ Richard A. Sinapi